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Attorneys for Plaintiff
JTH TAX LLC d/b/a LIBERTY TAX SERVICE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

JTH TAX LLC d/b/a LIBERTY TAX SERVICE,)	1:20-CV-00087
)	
)	
Plaintiff,)	PLAINTIFF JTH TAX LLC d/b/a
vs.)	LIBERTY TAX SERVICE'S
)	MOTION FOR ENTRY OF
OWEN H. D'SOUZA, NORMA C. D'SOUZA, and PICASSO TRIGGER COMPANY LLC,)	DEFAULT JUDGMENT
)	AGAINST DEFENDANTS
)	No Trial Date Set
Defendants.)	
)	

**PLAINTIFF JTH TAX LLC d/b/a LIBERTY TAX SERVICE'S
MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANTS**

COMES NOW Plaintiff JTH TAX LLC d/b/a LIBERTY TAX SERVICE

("Liberty" or "Plaintiff"), by and through its attorneys Gordon Rees Scully

Mansukhani, LLP, and requests that the Clerk of the Court enter the default of Defendants OWEN H. D’SOUZA, NORMA C. D’SOUZA, and PICASSO TRIGGER COMPANY LLC (collectively “Defendants”) on Plaintiff’s Complaint Filed February 24, 2020, for failure on the part of Defendants to plead or otherwise defend against the Complaint, as provided for in Rule 55(a) of the Federal Rules of Civil Procedure.

Liberty makes this motion pursuant to Fed. R. Civ. P. Rule 55, and Local Rule 7.1 and is supported by the accompanying memorandum in support, exhibits, and the records and files in this case.

DATED: Honolulu, Hawai‘i, November 28, 2020.

/s/ Mia D. Obciana
MIA D. OBCIANA

Attorney for Plaintiff
JTH TAX LLC d/b/a
LIBERTY TAX SERVICE

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII**

JTH TAX LLC d/b/a LIBERTY TAX SERVICE,)	1:20-CV-00087
)	
)	DECLARATION OF MIA D.
Plaintiff,)	OBCIANA
vs.)	
)	
OWEN H. D'SOUZA, NORMA C.)	
D'SOUZA, and PICASSO TRIGGER)	
COMPANY LLC,)	
)	
Defendants.)	
_____)	

DECLARATION OF MIA D. OBCIANA

I, MIA D. OBCIANA, declare as follows:

1. I am counsel for the Plaintiff in the above-entitled matter and that I am licensed to practice law in the courts of the State of Hawai'i, including the United States District Court for the District of Hawai'i.
2. All the facts set forth in this declaration are within my personal knowledge.
3. Plaintiff's Complaint was filed on February 24, 2020 and served upon Defendants on May 4, 2020. A true and correct copy of the Proof of Service was filed on May 20, 2020.

4. On May 27, 2020, counsel for Defendants entered his appearance for the record. ECF 18-19.

5. The time within which Defendants were required to file a response to the Complaint has expired and Defendants have not answered or otherwise moved to extend time to file their answer and have not requested an extension to file an answer.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Honolulu, Hawai‘i, November 28, 2020.

/s/ Mia D. Obciana
MIA D. OBCIANA